

EXHIBIT 7

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUND LIQUIDATION HOLDINGS LLC, as assignee and successor-in-interest to FrontPoint Asian Event Driven Fund L.P., MOON CAPITAL PARTNERS MASTER FUND LTD., and MOON CAPITAL MASTER FUND LTD., on behalf of themselves and all others similarly situated,

Plaintiffs,

-v.-

CITIBANK, N.A., BANK OF AMERICA, N.A., JPMORGAN CHASE BANK, N.A., THE ROYAL BANK OF SCOTLAND PLC, UBS AG, BNP PARIBAS, S.A., OVERSEA-CHINESE BANKING CORPORATION LTD., BARCLAYS BANK PLC, DEUTSCHE BANK AG, CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK, CREDIT SUISSE AG, STANDARD CHARTERED BANK, DBS BANK LTD., ING BANK, N.V., UNITED OVERSEAS BANK LIMITED, AUSTRALIA AND NEW ZEALAND BANKING GROUP, LTD., THE BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE HONGKONG AND SHANGHAI BANKING CORPORATION LIMITED, COMMERZBANK AG, AND JOHN DOES NOS. 1-50,

Defendants.

DECLARATION OF LINDA V. YOUNG

Pursuant to 28 U.S.C. §1746, I, Linda V. Young, declare:

1. I am the Vice President, Media with A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"). I submit this Declaration at the request of Plaintiffs' Counsel in connection with the proposed settlements (the "Settlements") of the above-captioned action (the "Action"). This Declaration is based upon my personal knowledge and information provided by Plaintiffs' Counsel, my associates, and A.B. Data staff members.

Docket No. 16-cv-05263 (AKH)

2. A.B. Data has been appointed as notice, claims, and/or settlement administrator in hundreds of large consumer, antitrust, securities, ERISA, insurance, and government agency matters. A profile of A.B. Data's background and capabilities is included as Exhibit A.

3. I have personally developed and directed some of the largest and most complex national notification plans in the United States. The scope of my work includes notification plans in securities, antitrust, consumer, ERISA, and insurance settlements. I have developed or consulted on more than 100 notification plans, placing millions of dollars' worth of media notice. My curriculum vitae is attached as Exhibit B.

4. This Declaration details a plan, attached as Exhibit C, designed to notify potential Class Members of the Settlements reached in this action (the "Proposed Notice Plan"). The Settlement Class is defined as:

All Persons (including both natural persons and entities) who purchased, sold, held, traded, or otherwise had any interest in SIBOR- and/or SOR-Based Derivatives during the Class Period, provided that, if Representative Plaintiffs expand the Class in any subsequent amended complaint, class motion, or settlement, the defined Class in this Agreement shall be expanded so as to be coterminous with such expansion. Excluded from the Settlement Class are the Defendants and any parent, subsidiary, affiliate or agent of any Defendant or any co-conspirator whether or not named as a Defendant, and the United States Government.

Direct Mail

5. Direct mail notice will be sent to market participants that deal in government and corporate bonds, mortgages, derivatives, and other debt securities that include:

- members of the International Swaps and Derivatives Association (“ISDA”), a global trade association for OTC derivatives responsible for maintaining the standardized ISDA Master Agreements;
- any executives at hedge funds, investment banks, traders, and real-estate companies; and
- a proprietary list of banks, brokers, and other investors.

Settling Defendants will provide contact information for their counterparties that transacted in SIBOR and/or SOR-Based Derivatives, consistent with the obligations set forth in the Settlement Agreements and relevant foreign bank secrecy and/or customer confidentiality laws that may restrict their ability to provide counterparty-identifying information to third parties.

Print Media

6. A summary notice will be placed as an ad in the United States version of each of the following publications:

- *Wall Street Journal*
- *Investor's Business Daily*
- *Financial Times*
- *Barron's*
- *Stocks & Commodities*
- *Hedge Fund Alert*
- *Grant's Interest Rate Observer*

Digital Media

7. Banner ads will appear on targeted financial websites such as marketplace.com, cnbc.com, finance.yahoo.com, and hundreds of others. Ads will be served across multiple devices,

including desktop, tablet, and mobile devices. They will be placed in premium positioning on websites ensuring that they can be easily seen when viewers first open website pages. Internet advertising allows the viewer to click on a banner advertisement and instantly be directed to the Settlement website.

8. The banner ad campaign will run for 30 days to ensure ample time to deliver the targeted impressions. At least 18 million impressions will be delivered to the target audience. All banner ads will include an embedded link to the Settlement website.

Social Media

9. To drive engagement with potential Class Members, newsfeed ads will be purchased on LinkedIn. These ads will be microtargeted to ISDA members and individuals who have expressed an interest in information relevant to the trading in SIBOR- and/or SOR-Based Derivatives markets.

Google AdWords/Search

10. Sponsored search listings will be placed through the Google search engine. When identified target phrases and keywords are used in searches on Google, links to the Settlement website will appear at the top of the search result pages. Representative keywords will include terms such as “SIBOR derivatives,” SOR derivatives,” “SIBOR markets,” “SOR markets,” and “ISDA trading.”

Earned Media

11. To supplement direct notice, a news release will be disseminated via *PR Newswire*'s US1 distribution list. This news release will be distributed via *PR Newswire* to the news desks of

approximately 10,000 newsrooms, including those of print, broadcast, and digital websites across the United States.

Toll-Free Telephone Number

12. A.B. Data will establish and maintain a case-specific toll-free telephone number to address potential Class Member inquiries. The toll-free telephone number will be equipped with an automated interactive voice response system that will present callers with a series of choices to hear prerecorded information. If callers need further help, they will have an option to speak with a live operator during business hours.

Settlement Website

13. A dedicated informational Settlement website will be developed to complement the Proposed Notice Plan and to ensure Class Members' easy access to updated information about the Action and the Settlements. The website will provide, among other things, a summary of the case and Class Member rights and options, relevant documents, important dates, and any pertinent updates concerning the Action. A.B. Data will also maintain an official email account that Class Members can utilize to ask questions.

Form and Content of Notice

14. A detailed Long-Form Notice will be used for direct mail notice and will be available on the Settlement website. A Short-Form Notice will be used to provide notice via the print publications and press release, as described in detail above. Both notices will include detailed information about the Action and the Settlements, including: that this is a class action; the definition of the Settlement Class in plain and engaging language; that the Settlement Class alleges Sherman Antitrust Act, 15 U.S.C. § 1 *et seq.*, Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1961-1968, and common law claims; that a Class Member may appear through an attorney (at

their own expense) if the Class Member desires; that Class Members can request to exclude themselves; the time and manner for requesting exclusion; and the binding effect of any judgment on Class Members. The banner will be developed to draw attention and encourage recipients to click on the ad to be directed to the Settlement website. An example banner ad is included in the Proposed Notice Plan. Each form of notice is well-organized and written in a reader-friendly, plain-English format for easy readership and comprehension.

Conclusion

15. It is my opinion that the Proposed Notice Plan described herein is adequate and reasonable and will effectively reach members of the Settlement Class. This Proposed Notice Plan conforms to the standards employed by A.B. Data in similar notification plans designed to reach groups or classes that trade in futures, securities, and commodities. The Proposed Notice Plan as designed is fully compliant with Rule 23 of the Federal Rules of Civil Procedure.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of May 2022.

A handwritten signature in black ink that reads "Linda V. Young". The signature is fluid and cursive, with "Linda" on top and "V. Young" below it.

Linda V. Young

EXHIBIT A



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CAPABILITIES

About A.B. Data

 Founded in 1981, **A.B. Data** has earned a reputation for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data offers unmatched resources and capacity and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortalSM, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

Location, Ownership Structure

 **A.B. Data is an independently owned**, 39-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

Services

All Digital — From Notice to Distribution

A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital payroll. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

Pre-Settlement Consultation

The pre-settlement consultation is a collaborative session designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

Media Services

A.B. Data continues to earn our reputation as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

Notice Administration

In A.B. Data, clients have a comprehensive resource with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

Claims Processing

A.B. Data continues to bring game-changing technologies to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

Contact Center

A.B. Data's Contact Center is comprised of a full staff that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

Case Websites

We offer a state-of-the-art technology platform that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

Settlement Fund Distribution

From complete escrow services to establishment of qualified settlement funds, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

Bruce A. Arbit, Co-Managing Director and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

Thomas R. Glenn, President, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

Eric Miller, Senior Vice President, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Ravin Raj, Vice President-Operations, has more than 15 years of experience in class action claims management, document management, and insurance claims remediation. Mr. Raj's responsibilities for A.B. Data's Class Action Administration Company include heading the shared operations center, which includes mailroom, contact center, claims processing, quality control, and information systems operations. His areas of expertise include business process development, strategic/tactical operations

planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. In his previous position, as Assistant Vice President-Operations at RR Donnelley India Pvt. Ltd., in Chennai, India, he led a team of more than 400 employees with the capacity to process more than 4 million claims a year, servicing several leading claims administrators. Mr. Raj managed six of the top ten securities class action settlements, by settlement value, including several multibillion-dollar settlements. His background also includes work as a Project Lead for iMarque Solutions Pvt. Ltd., Chennai, India.

Linda V. Young, Vice President, Media, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Young is an expert in media planning using most forms of advertising including digital, print, and broadcast. She developed some of the first Court-approved Notice Plans using an all-digital approach for cases such as *In re Vizio Consumer Privacy Litigation*, *In re Qualcomm Antitrust Litigation*, and *In re Google Inc. Street View Electronic Communications Litigation*, among others. Her ability to create notice plans that efficiently extend reach and drive class member engagement and participation has made a significant impact across many types of administrations. Ms. Young has developed and implemented national and international print, digital-, and earned-media notice plans for some of the industry's leading pharmaceutical, insurance, and securities class action cases, including Libor-based Financial Instruments Antitrust Litigation, Cipro Antitrust Cases I and II, Euribor and Euroyen-based Derivatives cases, and many more. She has more than 20 years of general market and ethnic media advertising and media planning experience, having managed advertising for brands such as Georgia-Pacific, American Express, Denny's, and Coca-Cola USA.

Eric Schachter, Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. He has over 15 years of experience in the legal settlement administration services industry. Mr. Schachter's responsibilities include ensuring successful implementation of claims administration services for A.B. Data's clients in accordance with settlement agreements, court orders, and service agreements. He also works closely with Project Managers to develop plans of administration to provide the highest level of effective and efficient delivery of work product. A frequent speaker on claims administration innovation and best practices at industry events nationwide, Mr. Schachter has a bachelor's degree in sociology from Syracuse University, earned his law degree at Hofstra University School of Law, and was previously an associate at Labaton Sucharow LLP in New York City.

Paul Sauberer, Director of Quality Assurance, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

Justin Parks, Vice President, provides expertise in legal marketing strategies and brings extensive experience in client relations to A.B. Data's business development team. Previously, Mr. Parks served the legal industry as part of the marketing group at a major class action administration firm where he successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases with an estimated value of several hundred million dollars in settlement funds distributed to class members, including some of the largest Employment settlements in history. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), several of which resulted in the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

Camron Assadi, Vice President, Digital Marketing, has more than 20 years of experience in digital marketing leadership, which includes directing and overseeing all aspects of the company's digital notice plans and campaigns across multiple networks and platforms. Mr. Assadi is an expert in online advertising and social media campaigns including Facebook, Google Ads, LinkedIn, Twitter, Amazon, Pinterest, Verizon Media, and others. He holds certifications in Google Ads Display and Search, and is a Facebook Certified Digital Marketing Associate. His ability to create and optimize business opportunities, extend brand reach, and capture the interest and support of local and international audiences has proven him an invaluable leader of A.B. Data's effort to maximize and streamline class member notice and engagement. Mr. Assadi has managed the notice plans for cases that have garnered millions of unique visitors and social media interactions. He holds a BS in Psychology from the University of Utah.

Adam Walter, PMP, Senior Project Manager, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

Steve Straub, Senior Project Manager, joined A.B. Data in February 2012. As a Senior Project Manager, his responsibilities include developing case administration strategies, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to case counsel, overseeing notice dissemination programs, implementing complex claims processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Straub's experience in administering class action settlements includes securities, consumer, and antitrust settlements, with a primary focus on antitrust cases. He holds a Juris Doctor degree from Seton Hall University School of Law, Newark, New Jersey.

Patty Nogalski, Project Manager, is a veteran in the equity and securities industry and now contributes her talents to A.B. Data as a Project Manager specializing in class action administrations for securities litigation. Ms. Nogalski brings to A.B. Data many new ideas, methods, and technologies to achieve project efficiency and organizational integration. For much of her twenty-year career, she served as Vice President Equity Trading for BMO Global Asset Management Corporation where she managed equity trading for mutual funds and institutional accounts. She works closely with Eric Miller and the project management team to deliver strategies that meet the unique needs of securities and commodities settlements. Ms. Nogalski attended the University of Wisconsin-Milwaukee where she earned her Bachelor of Arts in Communications, and has also obtained her Financial Industry Regulatory Authority (FINRA) Series 7, Series 63, and Series 65 licenses.

Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

Secure Environment



A.B. Data's facilities provide the highest level of security and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol - every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

Data Security



A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

Fraud Prevention and Detection



A.B. Data is at the forefront of class action fraud prevention.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

Representative Class Action Engagements



A.B. Data and/or its team members have successfully administered hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

Consumer & Antitrust Cases

- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc.* (“Lovenox Antitrust Matter”)
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*

- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*
- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
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- *Lomingkit, et al. v. Apollo Education Group, Inc., et al.*
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- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*
- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*

- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
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- *Lazan v. Quantum Corporation, et al.*
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- *The City of Providence vs. Aeropostale, Inc., et al.*
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- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
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- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*

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- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
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- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
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- *Eisenman v. The Ayco Company L.P.*
- *Matheson v. TD Bank, N.A.*
- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
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- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons ("USP Victorville")*
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- *American Federation of Government Employees, Local 506 v. U.S. Department of Justice, Federal Bureau of Prisons, U.S. Penitentiary Coleman II, Coleman, Florida*
- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
- *Alex Morgan, et al. v. United States Soccer Federation, Inc.*
- *Iskander Rasulev v. Good Care Agency, Inc.*
- *Kyndl Buzas, et al., v. Phillips 66 Company and DOES 1 through 10*
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- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
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- *Melissa Compere v. Nusret Miami, LLC, et al.*
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- *The State of Indiana v. Equifax Data Breach Settlement*
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- *Trost v. Premium Packaging L.L.C.*

Telephone Consumer Protection Act (TCPA) Cases

- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*
- *Charvat, et al. v. National Holdings Corporation*
- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America et al.*
- *Ellman v. Security Networks*

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EXHIBIT B

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EXPERIENCE

A.B. Data, Ltd., Milwaukee, WI

Vice President, Media

Lead the A.B. Data Class Action Administration media team in research, development, and implementation of media notice plans for settlements and other class action administrations. Cases include the following:

Antitrust/Commodities Cases

- *Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. et al.*, (Case No. 3:15-cv-01100) (M.D. Tenn.);
- *Laydon v. Mizuho Bank Ltd., et al.*, No. 12-cv-3419 (S.D.N.Y.) and *Sonterra Capital Master Fund Ltd., et al. v. UBS AG, et al.*, No. 15-cv-5844 (S.D.N.Y.);
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- *In re Loestrin 24 FE Antitrust Litigation*, Case No. MDL 2472, United States District Court, District of Rhode Island;
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- *In re Solodyn (Minocycline Hydrochloride) Antitrust Litigation (All End-Payor Actions)*, MDL No. 14-MD-2503-DJC, United States District Court, District of Massachusetts;
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- *In re Medco Health Solutions, Inc., Pharmacy Benefits Management Litigation*, MDL No. 1508, United States District Court, Southern District of New York;
- *In re Warfarin Sodium Antitrust Litigation*, MDL No. 98-1232 (SLR), United States District Court, District of Delaware;
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- *In re Terazosin Hydrochloride Antitrust Litigation*, 99-MDL-1317, United States District Court, Southern District of Florida;
- *In re Cardizem CD Antitrust Litigation*, 99-MD-1278, United States District Court, Eastern District of Michigan;

- *In re High Pressure Laminate Antitrust Litigation*, Civil Action No. 00C-1989 and Related Cases, Second Circuit Court for Davidson County, Tennessee, 20th Judicial District at Nashville;
- *In re Pennsylvania Baycol Third-Party Payor Litigation*, September Term, 2001 No. 001874, Court of Common Pleas, Philadelphia County, South Carolina;
- *In re Remeron End-Payor Antitrust Litigation*, Master File No. 02-CV-2007 (FSH), United States District Court, District of New Jersey;
- *In re Relafen Antitrust Litigation*, 01-12239-WGY, United States District Court, District of Massachusetts;
- *In re Buspirone Antitrust*, 01-MD-01413, United States District Court, Southern District of New York;
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*, No. 2:02cv442, United States District Court, Eastern District of Virginia;
- *Cipro Cases I and II*, Judicial Council Coordination Proceedings Nos. 4154 and 4220, Superior Court of the State of California, County of San Diego;
- *In re Potash Antitrust Litigation (II)*, No. 1:08-CV-6910, United States District Court, Northern District of Illinois;
- *In re Optiver Commodities Litigation*, No. 1:08-CV-06842-LAP, United States District Court, Southern District of New York;
- *In re: Rough Rice Commodity Litigation*, No. 11-CV-00618, United States District Court, Northern District of Illinois;
- *In re Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*, 10-CV-3617 (WHP) (“Futures Action”), United States District Court, Southern District of New York;

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- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee, d/b/a Nashville General Hospital and American Federation of State, County and Municipal Employees District Council 37 Health & Security Plan, v. Momenta Pharmaceuticals, Inc. and Sandoz Inc.*, Case No. 3:15-cv-01100, United States District Court, Middle District of Tennessee, Nashville Division;
- *In re Libor-Based Financial Instruments Antitrust Litigation*, Metzler Investment GmbH, et al., v. Credit Suisse Group AG, et al. Master File No. 11-md-2262 (NRB) Case No. Civ. 2613 (Exchange-Based Action), United States District Court, Southern District of New York;
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- *In re Broiler Chicken Antitrust Litigation.* Case No. 1:16-cv-08637, United States District Court for the Northern District of Illinois Eastern Division;
- *In re Ranbaxy Generic Drug Application Antitrust Litigation.* Case: 19-md-02878-NMG, United States District Court District of Massachusetts;
- *In re Broiler Chicken Antitrust Litigation.* Case No.: 1:16-cv-08637, In the United States District Court Northern District of Illinois Eastern Division;
- *In Re Opana ER Antitrust Litigation.* Case: 1:14-cv-10150, United States District Court Northern District of Illinois Eastern Division;
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- *In re Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*. Case No. 18-MD-2819 (NG) (LB) United States District Court Eastern District of New York;
- *In re Zetia (Ezetimibe) Antitrust Litigation*. Case No. 2:18-md-2836 United States District Court for the Eastern District of Virginia Norfolk Division;

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- *Boutchard, et al. v. Gandhi, et al.*, No. 1:18-cv-07041 (N.D. Ill.);
- *Elkin v. Walter Investment Management Corp.*, No. 2:17-cv-02025-JCJ, United States District Court, Eastern District of Pennsylvania;
- *In re Flowers Foods, Inc. Securities Litigation*, No. 7:16-CV-00222 (WLS), United States District Court, Middle District of Georgia, Valdosta Division;
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- *In re Medley Capital Stockholder Litigation*, No. 2019-0100-KSJM, The Court of Chancery of the State of Delaware;
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- *In re Starz Stockholder Litigation*, No. 12584-VCG, The Court of Chancery of the State of Delaware;
- *In re Quality Systems, Inc. Securities Litigation*, No. 8:13-cv-01818-CJC-JPR, United States District Court, Central District of California, Southern Division;
- *In re PTC Therapeutics, Inc. Securities Litigation*, No. 16-1224 (KM)(MAH), United States District Court, District of New Jersey;
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- *Rahman v. GlobalSCAPE, Inc., et al.*, No. 5:17-cv-00753-XR, United States District Court, Western District of Texas;
- *In re CytRx Corporation Securities Litigation*, No. 2:16-CV-05519-SJO-SK, United States District Court, Central District of California;
- *In re CPI Card Group Inc. Securities Litigation*, No. 16-cv-04531 (LAK), United States District Court, Southern District of New York;
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- *Kasper v. AAC Holdings, Inc., et al.*, No. 3:15-CV-00923-JPM, United States District Court, Middle District of Tennessee, Nashville Division;
- *In re Facebook, Inc. IPO Securities and Derivative Litigation*, MDL No. 12-2389, United States District Court, Southern District of New York;
- *GFI Group, Inc. Securities Litigation*, No. 1:14-CV-09438 WHP, United States District Court, Southern District of New York;

- *In re Juno Therapeutics Inc.*, No. C16-1069 RSM, United States District Court, Western District of Washington at Seattle;
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- *In re Nuko Information Systems, Inc.*, C-97-20471 EAI, United States District Court, Northern District of California;
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- *In re Massey Energy Co. Securities Litigation*, Civil Action No. 5:10-CV-00689-ICB, United States District Court, Southern District of West Virginia;
- *In re Fannie Mae 2008 Securities Litigation*, No. 08-CV-7831, United States District Court, Southern District of New York;
- *In re 2014 Avon Products, Inc. ERISA Litigation*, Case No. 1:14-cv-10083, United States District Court, Southern District of New York;
- *In re BioScrip, Inc. Securities Litigation*, Civil Action No. 13-CV-6922-AJN, United States District Court, Southern District of New York;

- *In re BP plc Securities Litigation*, No. 4:10-MD-02185, United States District Court, Southern District of Texas;
- *The Department of the Treasury of the State of New Jersey and Its Division of Investment v. Cliffs Natural Resources Inc., et al.*, No. 1:14-CV-1031, United States District Court, Northern District of Ohio;
- *In re Eastman Kodak ERISA Litigation*, Master File No. 6:12-CV-06051 DGL, United States District Court, Western District of New York;
- *In re NII Holdings, Inc. Securities Litigation*, Civ. No. 1:14-CV-00227-LMB-JFA, United States District Court, Eastern District of Virginia;
- *In re Nu Skin Enterprises, Inc., Securities Litigation*, Master File No. 2:14-CV-00033-JNP-BCW, United States District Court, District of Utah;
- *Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc., et al.*, Civil No. 12-3070 (JNE/HB), United States District Court, District of Minnesota;
- *In re TIBCO Software Inc. Stockholders Litigation*, Consolidated C.A. No. 10319-CB, Court of Chancery, State of Delaware;
- *In re Brightview Holdings, Inc. Securities Litigation*, Consolidated Civil Action Case No. 2019-07222, Court of Common Pleas of Montgomery County, Pennsylvania;
- *David Ronge, Individually and on Behalf of All Others Similarly Situated, v. Camping World Holdings, Inc., et al.*, Consolidated C.A. Case No. 1:18-cv-07030, United States District Court, Northern District of Illinois, Eastern Division;
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*, Consolidated Case No. 10-014311-CB, State of Michigan, in the Circuit Court for the County of Wayne;

- *Yellow Dog Partners, LP, Individually and on Behalf of All Others Similarly Situated, vs. Curo Group Holdings Corp., et al.*, C.A. Civil Action No. 2:18-cv-02662-JWL-KGG, United States District Court, District of Kansas, Kansas City;
- *Vancouver Alumni Asset Holdings Inc., Individually and on Behalf of All Others Similarly Situated, v. Daimler AG, Dieter Zetsche, Bodo Uebber, and Thomas Weber*, Master Case No. 16-cv-02942-DSF-KS, *Maria Munro, Individually and on Behalf of All Others Similarly Situated, v.Daimler AG, Dieter Zetsche, Bodo Uebber, and Thomas Weber* Case No. 16-cv-03412-DSF-KS, United States District Court, Central District of California;
- *Jennifer Tung, Individually and on Behalf of all Others Similarly Situated, v. Dycom Industries, Inc., Steven E. Nielsen and Andrew Deferrari*, Case No: 18-cv-81448-SINGHAL, United States District Court Southern District of Florida;
- *In re Henry Schein, Inc. Securities Litigation*, Master File No. 1:18-cv-01428-MKB-VMS, United States District Court, Eastern District of New York;
- *In re Impinj, Inc. Securities Litigation*, C.A. No. 3:18-cv-05704-RSL, United States District Court, Western District of Washington at Seattle;
- *Richard Di Donato, Individually and On Behalf of All Others Similarly Situated, v. Insys Therapeutics, Inc.; et al.*, Class Action No. CV-16-00302-PHX-NVW, United States District Court, for the District of Arizona;
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- *In re Netshoes Securities Litigation*, Index No. 157435 / 2018, Supreme Court of the State of New York, New York County;
- *In re Sequans Communications S.A. Securities Litigation*, Class Action, Case No. 1:17-cv04665-FB-SJB, United States District Court, Eastern District of New York;
- *Spectrum Brands Holdings, Inc., David M. Maura, Joseph S. Steinberg, George C. Nicholson, Curtis Glovier, Frank Iannna, Gerald Luterman, Andrew A. McKnight, Andrew Whittaker and HRG Group, Inc.*, Case No. 2019-CV-000982, State of Wisconsin, Circuit Court Branch 3, Dane County;
- *SEB Investment Management AB, individually and on behalf of all others similarly situated, v. Symantec Corporation and Gregory S. Clark*, No. C 18-02902 WHA, United States District Court, Northern District of California;
- *United States Steel Corporation, et al.*, Case No. 2:17-cv-0579-CB, United States District Court, Western District of Pennsylvania;
- *Harry Ploss, as Trustee for the Harry Ploss Trust DTD 8/16/1993, on behalf of Plaintiff and all others similarly situated, v. Kraft Foods Group, Inc. and Mondelez Global LLC*, Case No. 15-cv-02937, United States District Court, Northern District of Illinois, Eastern Division;
- *Richard Medoff v. CVS Caremark Corp., et al.*, Civil No. 09-cv-544-JNL, United States District Court, District of New York;
- *Norfolk County Retirement System, individually and on behalf of all others similarly situated, v. Community Health Systems, Inc., Wayne T. Smith and W. Larry Cash*, Consolidated Civil Action No.: 11-cv-0433, United States District Court for the Middle District of Tennessee, Nashville Division;

- *Douglas S. Chabot, et al., Individually and on Behalf of All Others Similarly Situated, Plaintiffs v. Walgreens Boots Alliance, Inc., et al., Defendants*, Civil Action No. 1:18-cv-02118-JEJ-KM, United States District Court, Middle District of Pennsylvania;
- *In re Obalon Therapeutics Inc. Securities Litigation*, Master File No. 3:18-cv-00352-AJB-AHG, United States District Court, Southern District of California
- *Plymouth County Contributory Retirement System, Individually and on Behaf of All Others Similarly Situated, Plaintiff, vs. Adamas Pharmaceuticals, Inc.; William Ericson; Martha J. Demski; Ivan Lieberburg; Gregory T. Went; Michael F. Bigham; David L. Mahoney; John Macphee; Rajiv Patni; Jennifer J. Rhodes; Alfred G. Merriweather; Christopher B. Prentiss; Richard King; Mardi C. Dier; Merrill Lynch, Pierce, Fenner, & Smith Incoporated; Leerink Partners LLC; and Evercore Group L.L.C.*, Case No.; RG19018715, Superior Court of the State of California for the County of Alameda;
- *Harry Ploss, as Trustee for the Harry Ploss Trust DTD 8/16/1993, on behalf of Plaintiff and all others similarly situated, Plaintiffs, v. Kraft Foods Group, Inc. and Mondelez Global LLC, Defendants*. Case No.; 15-cv-02937, In the United States District Court for the Northern District of Illinois Eastern Division;
- *In re Perrigo Company PLC Securities Litigation*, Case No.; 1:19-cv-00070-DLC, United States District Court, Southern District of New York;
- *In re Qudian Inc. Securities Litigation*, Master File No.: 1:17-cv-09741-JMF, United States District Court, Southern District of New York;
- *City of Hallandale Beach Police Officers' and Firefighters' Personnel Retirement Trust, on Behalf of Itself and All Others Similarly Situated, Plaintiff, v. Charles W. Ergen, Michael T. Dugan, David J. Rayner, Echostar Corp., Echostar BSS Corp., Hughes Network Corp., and BSS*

Merger Sub, Inc. Defendants. Case No.: A-19-797799-B Dept. No.: XI, District Court Clark County, Nevada;

- *Teamsters Local 456 Pension Fund, et al., Plaintiffs, vs. Universal Health Services, Inc., et al., Defendants.* Case No. 2:17-cv-02817-JHS, United States District Court, Eastern District of Pennsylvania;
- *Maz Partners LP, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. First Choice Healthcare Solutions, Inc. and Christian Romandetti, Sr., Defendants.* Case No. 6:19-cv-00619-PGB-LRH, United States District Court, Middle District of Florida Orlando Division;
- *In Re The Allstate Corporation Securities Litigation,* Case No. 16-cv-10510, In the United States District Court for the Northern District of Illinois Eastern Division;
- *In Re Willis Towers Watson PLC Proxy Litigation,* Civ. A. No. 1:17-cv-01338-AJT-JFA, In the United States District Court for the Eastern District of Virginia Alexandria Division;
- *Larry Enriquez, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. Nabriva Therapeutics PLC, TED Schroeder, Gary Sender, and Jennifer Schranz, Defendants.* Case No. 19 Civ. 4183 (VM), United States District Court, Southern District of New York;
- *In re Blue Apron Holdings, Inc. Securities Litigation* No. 17-cv-04846-NGG-PK, United States District Court, Eastern District of New York;
- *Christina Lewis, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. YRC Worldwide Inc., et al., Defendants.* Case No. 1:19-cv-00001-GTS-ATB, United States District Court, Northern District of New York;
- *Paul Eric Weiss, on behalf of himself and all other similarly situated former stockholders of Nutraceutical International Corporation, Plaintiff, v. Michael D. Burke, J. Kimo Esplin, Frank*

W. Gay II, Jeffrey A. Hinrichs, James D. Stice, HGGC Fund III, L.P. and HGGC LLC, Defendants. C.A. No. 2020-0364-PAF, In The Court of Chancery of the State of Delaware;

- *Oklahoma Police Pension and Retirement System, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. Sterling Bancorp, Inc.; Gary Judd; Thomas Lopp; Michael Montemayor; Scott Seligman; Barry Allen; Jon Fox; Seth Meltzer; Sandra Seligman; Peter Sinatra; Benjamin Wineman; Lyle Wolberg; Piper Sandler Companies; and American Capital Partners, LLC, Defendants.* Case 5:20-cv-10490-JEL-EAS, United States District Court, Eastern District of Michigan;
- *SEB Investment Management AB, individually and on behalf of all others similarly situated, Plaintiffs, v. Symantec Corporation and Gregory S. Clark, Defendants.* Case No. 3:18-cv-02902-WHA ECF CASE, United States District Court, Northern District of California San Francisco Division;
- *Christopher Vataj, Plaintiff, v. William D. Johnson, et al., Defendants.* Case No. 19-cv-06996-HSG, United States District Court, Northern District of California;
- *Patrick Machniewicz, Individually and on behalf of all others similarly situated, Plaintiff, v. Uxin Limited, Kun Dai, Zhen Zeng, Rong Lu, Julian Cheng, Dou Shen, Hainan Tan, Morgan Stanley & Co. International PLC, Goldman Sachs (Asia) L.L.C., J.P. Morgan Securities LLC, China International Capital Corporation Hong Kong Securities Limited, and China Renaissance Securities (Hong Kong) Limited, Defendants.* Case No: 1:19-cv-822-MKB-VMS, United States District Court, Eastern District of New York;
- *Dr. William Tomaszewski, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, v. Trevena, Inc., Maxine Gowen, and David Soergel, Defendants.* Civil Action No. 2:18-cv-4378-CMR, United States District Court, Eastern District of Pennsylvania;

- *In re Restoration Robotics, Inc. Securities Litigation.* Case No. 5:18-cv-03712-EJD, United States District Court, Northern District of California San Jose Division;
- *In re Dynagas LNG Partners LP Securities Litigation* Case No. 1:19-cv-04512 (AJN), United States District Court, Southern District of New York;
- *St. Lucie County Fire District Firefighters' Pension Trust, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. Southwestern Energy Company, et al., Defendants.* No. 2016-70651, In The District Court of Harris County, Texas 61ST Judicial District;
- *Hollywood Firefighters' Pension Fund, West Palm Beach Firefighters' Pension Fund, and Sheet Metal Workers' Local Union No. 80 Pension Trust Fund, on behalf of themselves and all others similarly situated, Plaintiffs, v. John C. Malone, Gregory B. Maffei, Gregg L. Engles, Ronald A. Duncan, Donne F. Fisher, and Richard R. Green, Defendants.* C.A. No. 2020-0880-SG, In The Court of Chancery of the State of Delaware;
- *Avi Yaron, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. Intersect ENT, Inc., Lisa D. Earnhardt, Jeryl L. Hilleman, and Robert H. Binney, Jr., Defendants.* Case No.: 4:19-cv-02647-JSW, United States District Court, Northern District of California;
- *The Arbitrage Fund et al Plaintiff(s) v. William Petty et al Defendant(s).* Case No: 2018-004060-CA-01, In the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida;
- *In re JPMorgan Precious Metals Spoofing Litig.*, No. 1:18-cv-10356 (S.D.N.Y.)
- *In Re Maxar Technologies, Inc. Shareholder Litigation.* Case No. 19CV357070, Superior Court of the State of California County of Santa Clara;
- *In Re Frontier Communications Corporation Stockholders Litigation.* Case No. 3:17-cv-01617-VAB, United States District Court District of Connecticut;

- *In Re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations.* Misc. Action No. 13-mc-1288 (RCL), In the United States District Court for the District of Columbia;
- *Dan Kohl, et al., Plaintiff, v. Loma Negra Compania Industrial Argentina Sociedad Anonima, Loma Negra Holding GMBH, Sergio Faifman, Marco Gradin, Ricardo Fonseva De Mendonca Lima, Luiz Augusto Klecz, Paulo Diniz, Carlos Boero Hughes, Diana Mondino, Sergio Daniel Alonso, Bradesco Securities Inc., Citigroup Global Markets Inc., HSBC Securities (USA) Inc., Itau BBA USA Securities, Inc., Merrill Lynch, Pierce, Fenner & Smith Incorporated and Morgan Stanley & Co. LLC.* Index No. 653114/2018, Supreme Court of the State of New York County of New York;
- *In Re Merit Medical Systems, Inc. Securities Litigation.* Case No. 8:19-cv-02326-DOC-ADS, United States District Court Central District of California;
- *In re JPMorgan Treasury Futures Spoofing Litig.*, No. 1:20-cv-03515 (S.D.N.Y.);
- *Cory Longo, individually and on behalf of all others similarly situated, et al., Plaintiffs v. OSI Systems, Inc., et al., Defendants.* Case No. CV 17-8841 FMO (SKx), United States District Court Central District of California;
- *In Re Navient Corporation Securities Litigation.* Case: 1:17-cv-08373-RBK-AMD, United States District Court District of New Jersey;
- *In Re Vivint Solar, Inc. Securities Litigation.* Case No. 2:20-cv-919 (JNP) (CMR), In the United States District Court District of Utah, Central Division;
- *In Re Perrigo Company PLC Securities Litigation.* Case No. 1:19-cv-00070-DLC, United States District Court Southern District of New York;

- *In Re Aqua Metals, Inc. Securities Litigation.* Case No.: 4:17-cv-07142-HSG, United States District Court Northern District of California Oakland Division;
- *SEB Investment Management AB, individually and on behalf of all others similarly situated, Plaintiffs, v. Symantec Corporation and Gregory S. Clark, Defendants.* Case No. 3:18-cv-02902-WHA, United States District Court Northern District of California San Francisco Division;
- *Sandra Searles, individually and on behalf of all others similarly situated, Plaintiff, v. Richard M. Demartini, Christopher G. Marshall, R. Eugene Taylor, Crestview Partners, L.P., Crestview-NAFH, LLC and Crestview Advisors, LLC, Defendants.* Case No. 2020-0136-KSJM, In the Court of Chancery of the State of Delaware;
- *In Re PPDAI Group Inc. Securities Litigation.* Case No: 1:18-cv-06716-LDH-TAM, United States District Court Eastern District of New York;
- *Jeff Kirkland, Anthony Fiore, and Employees' Retirement System of the Puerto Rico Electric Power Authority, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, -against- WIDEOOPENWEST, INC., Steven Cochran, Richard E. Fish, Jr., David Frederick Burgstahler, Brian Cassidy, Daniel Kilpatrick, Jeffrey Marcus, Phil Seskin, Joshua Tamaroff, Avista Capital Partners, UBS Securities LLC, Credit Suisse Securities (USA) LLC, RBC Capital Markets, LLC, Suntrust Robinson Humphrey, Inc., Evercore Group LLC, MacQuarie Capital (USA) Inc., Liontree Advisors LLC, and Raymond James & Associates, Inc., Defendants.* Index No. 653248/2018, Supreme Court of the State of New York County of New York: Commercial Division;
- *Public Employees' Retirement System of Mississippi, Individually and on behalf of all others Similarly Situated, Plaintiff, v. Treehouse Foods, Inc., Sam K. Reed, Dennis F. Riodan and*

Christopher D. Silva. Defendants. Case No.: 16-cv-10632, United States District Court Northern District of Illinois;

- *Ronald L. Jackson, as Trustee Under Agreement Dated 01/05/2012 by Ronald L. Jackson, Individually, and on Behalf of all Others Similarly Situated, Plaintiff, v. Microchip Technology Inc.; Steve Sanghi; Ganesh Moorthy; and J. Eric Bjornholt, Defendants.* Case No. 2:18-cv-02914-ROS, United States District Court District of Arizona;
- *City of Hallandale Beach Police Officers' and Firefighters' Personnel Retirement Trust, on Behalf of Itself and all others similarly situated, Plaintiff, v. Charles W. Ergen, Michael T. Dugan, David J. Rayner, Echostar Corp., Echostar BSS Corp., DISH Network Corp., and BSS Merger SUB Inc. Defendants.* Case No.: A-19-797799-B, District Court Clark County, Nevada;
- *In RE TAL Education Group Securities Litigation.* Case No. 1:18-cv-05480-LAP-KHP, United States District Court Southern District of New York;
- *In Re Evoqua Water Technologies Corp. Securities Litigation.* Case 1:18-cv-10320-JPC, United States District Court Southern District of New York;
- *Utah Retirement Systems, Plaintiff, v. Healthcare Services Group, Inc., Daniel P. McCartney, Theodore Wahl, John C. Shea, and Matthew J. McKee, Defendants.* Case No. 2:19-cv-01227-ER, United States District Court Eastern District of Pennsylvania;
- *In re Lyft, Inc. Securities Litigation.* Case No. 4:19-cv-02690-HSG, United States District Court Northern District of California Oakland Division;
- *In re Myriad Genetics, Inc. Securities Litigation.* Case No. 2:19-cv-00707-DBB The United States District Court District of Utah;
- *Ronald L. Jackson, Plaintiff, v. Microchip Technology Incorporated, et al., Defendants.* Case No. CV-18-02914-PHX-JJT In the United States District Court for the District of Arizona;

- *Daniel Yannes, Individually and on behalf of All Others Similarly Situated, Plaintiff, vs. SCWORX CORPORATION and MARC S. SCHESSEL, Defendants.* Case No. 20-cv-3349-JGK United States District Court Southern District of New York;
- *In re Columbia Pipeline Group, Inc. Merger Litigation.* Case No. 2018-0484-JTL In the Court of Chancery of the State of Delaware;
- *The ARBITRAGE FUND, on behalf of itself and all other similarly situated shareholders of EXACTECH, INC., Plaintiff, v. WILLIAM PETTY, BETTY PETTY, DAVID PETTY, PRIMA INVESTMENTS, INC., PRIMA INVESTMENTS, L.P., JAMES G. BINCH, ANDREW KRUSEN, JR., WILLIAM B. LOCANDER, RICHARD C. SMITH, and FERN S. WATTS, Defendants.* Case No. 2018-004061 Circuit Court of Florida Eleventh Judicial Circuit Miami-Dade County;
- *In re Yay Yo, Inc. Securities Litigation.* Case No. 2:20-cv-08235-SVW-AFM United States District Court Central District of California;

Consumer Cases

- *Charles Roberts, an individual, and Kenneth McKay, an individual, on Behalf of Themselves and Others Similarly Situated v. C.R. England, Inc., a Utah Corporation; and Opportunity Leasing, Inc., a Utah Corporation,* Civil Case No. 2:12-cv-00302, United States District Court, District of Utah, Central Division;
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC,* No. 18-2-00283-4 SEA, Superior Court of the State of Washington King County;

- *Wave Lengths Hair Salons of Florida, Inc., on Behalf of Itself and All Others Similarly Situated, d/b/a Salon Adrian v. CBL & Associates Properties, Inc., CBL & Associates Management, Inc., CBL & Associates Limited Partnership, and JC Gulf Coast Town Center, LLC*, No. 2:16-cv-206-FtM-PAM-MRM, United States District Court, Middle District of Florida, Fort Myers Division;
- *In re: Vizio, Inc., Consumer Privacy Litigation*, No. 8:16-md-02693-JLS (KESx), United States District Court, Central District of California, Santa Ana Division;
- *In re Google LLC Streetview Electronic Communications Litigation*, Case No. 5:10-md-02184, United States District Court, Northern District of California, San Francisco Division;
- *MSPA Claims 1, LLC v. Ocean Harbor Cas. Ins. Co.*, No. 2015-1946 CA-01, Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida;
- *Valle v. Popular Community Bank*, No. 653936/2012, Supreme Court, State of New York, County of New York;
- *Bizarro, et al., v. Ocean County*, No. OCN-1644-17, Superior Court of New Jersey, Law Division, Ocean County;
- *Christina Martin et al. v. the State of Washington, et al.*, No 14-2-00016-7, Superior Court, State of Washington, County of Spokane;
- *Picant v. Premier Cruise Lines*, 96-06932-CA-FN, 18th Judicial Circuit, State of Florida;
- *McParland and Picking v. Keystone Health Plan Central, Inc.*, Civil Action No. 98-SU- 00770-01, Court of Common Pleas, York County, Pennsylvania;
- *Smith v. American Family Mutual Automobile Insurance Co.*, No. 00-CV-211554, Circuit Court of Jackson County, Missouri;
- *Phil Shin, on Behalf of Himself and All Others Similarly Situated v. Plantronics, Inc.*, No. 5:18-cv-05626-NC, United States District Court, Northern District of California;

- *Lincoln Adventures, LLC, a Delaware Limited Liability Company and Michigan Multi-King, Inc., a Michigan Corporation, on Behalf of Themselves and All Those Similarly Situated v. Those Certain Underwriters at Lloyd's, London Members of Syndicates, et al.*, No. 2:08-cv-00235-CCC-JAD, United States District Court, Court of New Jersey;
- *Scott Meeker and Erin Meeker, Kelly Goodwin, Bruce Ely and Kristi Hauke, Elizabeth Borte and Rino Pasini, Christian Miner, and Judy Sanseri and Howard Banich; Individually and on Behalf of All Others Similarly Situated v. Bullseye Glass Co., an Oregon Corporation*, Civil Action No. 16CV07002, In the Circuit Court of the State of Oregon, County of Multnomah;
- *Duncan v. The Unity Life and Accident Insurance Association, et al.*, Civil Action No. 00-CIV-7621, United States District Court, Southern District of New York;
- *Duncan v. Columbian Protective Association of Binghamton, New York, and Columbian Mutual Life Insurance Company*, No. 00 CIV. 7236 (JGK), United States District Court, Southern District of New York;
- *Watkins, as Executrix of the Estate of Hines, and as Beneficiary of the Adult Whole Life Industrial Policy of Hines, v. Columbian Mutual Life Insurance Company, a Subsidiary of Columbian Financial Group, and Golden Eagle Mutual Life Insurance Corporation*, No. 03 CIV. 8620 (JGK), United States District Court, Southern District of New York;
- *In re: Benzion v. Vivint, Inc.*, No. 12-CV-61826-WJZ, United States District Court, Southern District of Florida;
- *In re: ADT Security Services, Inc.*, No. 1:11-CV-1925, United States District Court, Northeastern District of Illinois;
- *The State of Illinois v. Au Optronics Corporation, et al.*, No. 10 CH 34472, Circuit Court of Cook County, Illinois;

- *State of Washington v. AU Optronics Corporation, et al.*, No. 10-2-29164-4 SEA, King County Superior Court, Washington;
- *LLE One, LLC, et al. v. Facebook, Inc.*, Case No. 4:16-cv-06232-JSW, United States District Court, Northern District of California;
- *Mey v. Interstate National Dealer Services, Inc., et al.*, No. 1:14-CV-01846-ELR, United States District Court, Northern District of Georgia;
- *Estakhrian, et al., v. Obenstine, et al.*, No. CV11-3480-FMO (CWx), Nevada District Court;
- *Krakauer v. DISH Network, L.L.C.*, Civil Action No. 14-CV-333, United States District Court, Middle District of North Carolina;
- *Lofton v. Verizon Wireless (VAW) LLC*, No. 13-CV-05665-YGR, United States District Court, Northern District of California;
- *Lyons, et al., v. Litton Loan Servicing, LP, et al.*, No. 13-CV-00513, United States District Court, Southern District of New York;
- *Katz, et al. v. Live Nation, Inc., et al.*, Civil Action No. 1:09-CV-003740-MLC-DEA, United States District Court, District of New Jersey;
- *Bergman, et al. v. DAP Products Inc., et al.*, No. 14-CV-03205-RDB, United States District Court, District of Maryland;
- *In re Google LLC Street View Electronic Communications Litigation*, Case No. 3:10-md-02184-CRB, United States District Court, Northern District of California, San Francisco Division;
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*, No. 18-2-00283-4 SEA, Superior Court of the State of Washington King County;
- *Valle v. Popular Community Bank*, No. 653936/2012, Supreme Court, State of New York, County of New York;

- *Royce Solomon, et al., individually and on behalf of all others similarly situated, v. American Web Loan, Inc., et al.*, Class Action, Civil Action No. 4:17-cv-0145-HCM-RJK, United States District Court, Eastern District of Virginia, Newport News Division;
- *Arandell Corporation, et al., v. Xcel Energy, Inc., et al.*, Case No.: 3:07-cv-00076-wme; *Newpage Wisconsin System Inc., v. CMS Energy Resource Management Company, et al.*, Case No.:3:09-cv-00240-wme, United States District Court for the Western District of Wisconsin;
- *Jeffrey Koenig and Marcellus Holt, on behalf of themselves and all others similarly situated, Plaintiffs, v. Vizio, Inc., Defendant.* LASC Case No: BC702266, Superior Court of the State of California for the County of Los Angeles;
- *Tallen Todorovich, on behalf of himself and all others similarly situated, Plaintiff, against, 63 Wall Street Owner, LLC and 67 Wall Street Owner LLC, Defendants.* Index No.: 161441/2019, Supreme Court of the State of New York, County of New York
- *Melissa Atkinson and Katie Renvall, Individually and on Behalf of Classes of Similarly Situated Individuals, Plaintiffs, v. Minted, Inc., Defendant.* Case No.: 3:20-cv-03869-VC, United States District Court, Northern District of California;
- *William Cleary, et al., Plaintiffs, v. American Airlines, Inc, Defendant.* Case 4:21-cv-00184-O, In the United States District Court for the Northern District of Texas Fort Worth Division;
- *Andrew Mackmin, et al., Plaintiffs, v. VISA Inc., et al., Defendants.* Case 1:11-cv-01831-RJL, In the United States District Court for the District of Columbia;
- *Peter Staley, et al. Plaintiffs, v. Gilead Sciences, Inc., et al. Defendants.* Case No. 3:19-cv-02573-EMC, In the United States District Court for the Northern District of California San Francisco Division;

- *Olean Wholesale Grocery Cooperative, Inc., et al., Plaintiffs, v. AGRI STATS, Inc., et al., Defendants.* Case: 1:19-cv-08318, United States District Court Northern District of Illinois Eastern Division;
- *In re Valeant Pharmaceuticals International, Inc. Third Party Payor Litigation.* Case 3:16-cv-03087-MAS-LHG, United States District Court District of New Jersey;
- *Peter Staley, et al. Plaintiffs, v. Gilead Sciences, Inc., et al. Defendants.* Case No. 3:19-cv-02573-EMC United States District Court for the Northern District of California, San Francisco Division;
- *Brian Resendez, Rodica Alina Resendez, individually and on behalf of all others similarly situated. Plaintiffs. v. Precision Castparts Corp., an Oregon corporation, and PCC Structurals, Inc., Defendants;* Case No. 16cv16164 In The Circuit Court of the State of Oregon for the County of Multnomah;
- *BCBSM, INC., d/b/a BLUE CROSS and BLUE SHIELD OF MINNESOTA, on behalf of itself and those similarly situated, Plaintiff, v. VYERA PHARMACEUTICALS, LLC, PHOENIXUS AG, MARTIN SHKRELI, and Kevin Mulleady, Defendants.* Case No. 1:21-cv-1884-DLC In The United States District Court for the Southern District of New York;

Employment Cases

- *Tapanga Hardeman, et al., Plaintiff, v. Office of Lake County Sheriff, et al. Defendant.* Case No. 1:17-cv-08729, United States District Court, for the Northern District of Illinois – CM/ECF LIVE, Ver 6.3.3 Eastern Division;
- *Ronen Sartena, Elizabeth Gordon, Nathaniel Dearth, and Isabel Strobing, on behalf of themselves and all others similarly situated, Plaintiffs, against, Meltwater News US, Inc. and Meltwater News US I, INC., Defendants.* Index No.: 614389/2020, Supreme Court of the State of New York, County of Suffolk;

Mile Marker Zero, LLC, Greenville, SC

Principal

Directed the development of marketing and advertising plans for national and local clients, including the following:

- **Complete Claim Solutions, Inc.**

Mile Marker Zero worked with Complete Claim Solutions, Inc., for six years as its sole media planning and buying partner. Mile Marker Zero developed and implemented national and international print and earned media notice programs to support the notification of consumers and third-party payors in cases such as the following:

Coumadin-Warfarin	Taxol	Van Kampen
Hytrin	Waste Management	Unity Life Insurance Co.
Cardizem	Campbell Soup	Premier Cruise Lines
Buspar	Alias Research	MedCo
Nuko	Augmentin	Berkshire Realty
Columbian Mutual Life	Keystone Health Plan	Platinol
Freeport-McMoRan	Seitel, Inc. Securities	Transaction System Architects
Sulpher, Inc.	Relefen	Remeron
Service Corporation	3M-Scotch	Baycol

International		
Smartforce, PLC	American Family Mutual Automobile Insurance Co.	Eaton Vance Corp.
Cipro	PriceSmart	Premarin
Morgan Stanley		

Other clients include:

- **The National Arthritis Foundation**
- **Papa Murphy's Pizza**
- **FIERO** (Fire Industry Equipment Research Organization) – national fire services association.
- **TeamPoint Systems, Inc.** – a global software company

Denny's Corporation, Spartanburg, SC

Senior National Advertising Manager

The Coca-Cola Company, Atlanta, GA

Advertising Services Manager

McCann Erickson, Atlanta, GA

Media Supervisor

EDUCATION

Bachelor of Business Administration, University of North Dakota

Exhibit C



A.B. Data, Ltd.
Class Action Administration Company
600 A.B. Data Drive
Milwaukee, WI 53217

Notice Plan

Fund Liquidation Holdings LLC, as assignee and successor-in-interest to FrontPoint Asian Event Driven Fund L.P., et al., v. Citibank, N.A., et al.

No. 16-cv-05263 (AKH)

United States District Court for the Southern District of New York

May 13, 2022

NOTICE PLAN OVERVIEW

Case Background

This Notice Plan is submitted by A.B. Data, Ltd. (“A.B. Data”) in connection with *Fund Liquidation Holdings LLC, as assignee and successor-in-interest to FrontPoint Asian Event Driven Fund L.P., et al., v. Citibank, N.A., et al.*, 16-cv-05263 (AKH) (the “Action”), a case before the United States District Court for the Southern District of New York.

This document outlines the efforts that will be made to provide notice of the Settlements to potential Class Members. Direct mail notice is intended to be the primary method of contacting a substantial portion of Class Members. However, because direct mail notice in this case may not reach all potential Class Members, a paid media Notice Plan targeting unidentified Class Members is used to supplement the direct mail notice.

The Notice Plan described herein is consistent with the requirements set forth in Rule 23 of the Federal Rules of Civil Procedure and is consistent with other A.B. Data-developed notice plans that have been approved by the Court and implemented in other financial securities cases with regard to the methods and tools used in such plans. These cases include the following:

- *In re JPMorgan Precious Metals Spoofing Litigation*, No. 1:18-cv-10356 (S.D.N.Y.);
- *In re JPMorgan Treasury Futures Spoofing Litigation*, No. 1:20-cv-03515 (S.D.N.Y.);
- *Boutchard, et al. v. Gandhi, et al.*, No. 18-cv-7041 (N.D. Ill.); and
- *Laydon v. Mizuho Bank Ltd., et al.*, No. 12-cv-3419 (S.D.N.Y.) and *Sonterra Capital Master Fund, Ltd., et al. v. UBS AG, et al.*, No. 15-cv-5844 (S.D.N.Y.).

Class Definition

The Settlement Class for this Notice Plan includes the following:

All Persons (both natural persons or entities) who purchased, sold, held, traded, or otherwise had any interest in SIBOR- and/or SOR-Based Derivatives during the period from at least January 1, 2007, through December 31, 2011 (the “Class Period”).

Excluded from the Class are:

- Defendants and any parent, subsidiary, affiliate or agent of any Defendant or any co-conspirator whether or not named as a Defendant; and
- the United States Government.

Paid Media Placement Summary

A.B. Data recommends targeted paid media notice consisting of direct mail, print, digital, and earned media that will reach both identified and unidentified Class Members. Each of the following Notice Plan elements is detailed further in this document:

- Direct mail;

- Print media;
- Digital media; and
- Earned media.

Targeted print and digital media placements are recommended to deliver the message to potential Class Members and other concerned persons and entities whose identities are unknown. Summaries of the recommended media tactics for each publication and digital media source follow.

A dedicated informational case website, which will include the Long-Form Notice and Short-Form Notice, will be developed to complement the Notice Plan and to ensure Class Members easy access to updated information.

Target Audience

A.B. Data researched investors who transacted in SIBOR- and/or SOR-Based Derivatives to determine the target audience of potential Class Members. This information assisted in determining the most appropriate media vehicles that would best target potential Class Members and provide them with the opportunity to see and respond to the Notice. It has been determined that media targeting persons associated in the investment, finance, banking, brokerage, pension, and institutional investment management industries would be most likely to reach potential Class Members.

Paid and Earned media will be targeted to potential Class Members located or doing business in the United States and territories.

Direct Mail

Notice will be sent to market participants that deal in government and corporate bonds, mortgages, derivatives, and other debt securities, including: (1) members of the International Swaps and Derivatives Association (“ISDA”), a global trade association for OTC derivatives responsible for maintaining the standardized ISDA Master Agreements; (2) any executives at hedge funds, investment banks, traders, and real-estate companies; and (3) a proprietary list of banks, brokers, and other investors. Settling Defendants will provide contact information for their counterparties that transacted in SIBOR and/or SOR-Based Derivatives, consistent with the obligations set forth in the Settlement Agreements and relevant foreign bank secrecy and/or customer confidentiality laws that may restrict their ability to provide counterparty-identifying information to third parties.

Dealer Notification

In addition to the direct mail notice described above, notice will be sent directly to all other banks that deal in financial derivatives transactions, requesting that they either (a) forward the notice on to their customers, or (b) provide a customer list that the Settlement Administrator can notify directly.

Print Media

The Short-Form Notice will be published in each of the following investor- and business-targeted print publications. Summaries of the audience reached, editorial focus, and recommended media tactics follow for each publication.

- *The Wall Street Journal*
- *Investor's Business Daily*
- *Financial Times – United States Edition*
- *Stocks & Commodities*
- *Barron's*
- *Grant's Interest Rate Observer*
- *Hedge Fund Alert*

THE WALL STREET JOURNAL.

Publication Name/Website	https://www.wsj.com/
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Monday – Saturday
Circulation	1,322,000
Editorial Focus	Publishing original business news and financial information with expanded content in arts, culture, lifestyle, and sports.

INVESTOR'S BUSINESS DAILY®

Publication Name/Website	https://www.investors.com/
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Weekly on Monday; available online the Saturday prior
Circulation	90,000
Editorial Focus	An authoritative financial news and research organization recognized for its proprietary investing screens, investment ratings, and strong record of identifying market leaders as they emerge.



Publication Name/Website	https://www.ft.com/
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Monday – Saturday
Circulation	28,879
Editorial Focus	One of the world's leading business and financial news publications providing essential news, commentary, data, and analysis for the global business community.

TECHNICAL ANALYSIS OF STOCKS & COMMODITIES

Publication Name/Website	http://traders.com/
Media Tactics	Publish Summary Notice one time to U.S. audience; email blast of Summary Notice to digital subscribers; banner ads on e-newsletters; 30-day banner ad campaign
Publishing Frequency	Monthly
Circulation	Print Magazine – 34,000 E-newsletter – 200,000 Email Blast – 150,000
Editorial Focus	Provides information on how to apply technical analysis tools to charting, numerical, and computer methods for trading stocks, bonds, mutual funds, options, and commodities.



Publication Name/Website	https://www.barrons.com/
Media Tactics	Publish Summary Notice two times to U.S. audience
Publishing Frequency	Weekly on Monday; available online the Saturday prior
Circulation	307,700
Editorial Focus	America's premier financial magazine, renowned for its market-moving stories. It reaches an audience of top corporate executives, institutional investors, and financial professionals.



INTEREST RATE OBSERVER®

Publication Name/Website	https://www.grantspub.com/
Media Tactics	Publish Summary Notice three times
Publishing Frequency	24 times annually
Circulation	6,200
Editorial Focus	An independent, value-oriented, and contrary-minded journal of the financial markets with clear and unconventional thinking, micro and macro analysis, and speculation about the future informed by knowledge of the past.



Publication Name/Website	https://hfalert.com/
Media Tactics	Publish Summary Notice one time in digital edition of magazine
Publishing Frequency	47 times annually
Circulation	2,500
Editorial Focus	Offers breaking news in the worldwide alternative investment business along with a steady flow of unbiased reporting on behind-the-scenes developments affecting fund managers, their investors, and service providers. Subscribers pay \$4,597 for an annual subscription.

Digital Media

A.B. Data recommends placing banner, search, and social media ads on a variety of websites and social media platforms, enabling maximum exposure and delivering the reach required to satisfy Rule 23 and due process. We recommend scheduling a 30-day campaign, which ensures ample time to deliver the targeted impressions. Approximately 18 million impressions are recommended to ensure potential Class Members are reached with the frequency needed for them to become aware of the Action. All banner and newsfeed ads will include embedded and trackable links to the case-specific website. Ad performance, links, and traffic will be tracked using Google Analytics, providing a way to optimize ads for visitors and traffic.

The digital media will be chosen first to meet audience notification requirements, and second to achieve maximum engagement with the ads. Apps targeted to the financial, trading, and investment communities will be reviewed for compatibility to reach potential Class Members. Campaigns will be optimized to drive potential Class Members to visit the website. The following digital media platforms are recommended:



A mix of Internet banner and newsfeed ads will be run using the Google Display Network via its thousands of websites, as well as mobile devices and apps. Website categories that will be targeted include financial, investment, derivatives, CFO, “C-suite,” and other finance and investment community decision makers.



LinkedIn is a social networking site designed specifically for the business community. It allows registered members to establish and document networks of people they know and trust professionally. Many keep an online list of professional contacts and business connections, search for new job opportunities, and post professional opinions and work-related information.

Newsfeed ads will be targeted to specific LinkedIn groups that have been formed to address businesspeople associated with the investment industry. Some of the targeted group categories include SIBOR Derivatives, SIBOR markets, SIBOR Rates, SIBOR Quotes, ISDA traders, derivatives investors, commodities traders, financial advisors, institutional investors, portfolio managers, chief financial officers, pension directors, and many others.

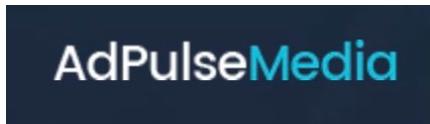


To assist further in locating potential Class Members, A.B. Data will develop and monitor a Google AdWords and key search terms program. When identified target phrases and keywords are entered in a search by users in the target regions on Google and Google-syndicated search pages, links to the case website will appear on the search results pages.

Representative keywords could include "SIBOR derivatives," "SOR derivatives," "SIBOR markets," "SOR markets," "ISDA trading," plus many others.



Stocks & Commodities magazine runs the website traders.com as the digital media component of their print publication. A 30-day banner ad campaign will be placed on the website, along with banner ads on their monthly e-newsletter sent to 200,000 subscribers, and a custom email blast with the Summary Notice sent to approximately 150,000 recipients.



A behaviorally targeted campaign will be purchased via a custom business, financial, and investment network on websites like Bloomberg.com, investors.com, Barchart.com, and marketwatch.com with ads served specifically to people who are searching or have previously searched for information on derivatives and investing. A sampling of the websites included in this network are listed below.

247wallst.com	investorguide.com
nasdaq.com	bloomberg.com
americanbulls.com	investors.com
barchart.com	istockanalyst.com
investorplace.com	marketscreener.com
bloomberg.com/businessweek	marketwatch.com

bnnbloomberg.ca	money.cnn.com/investing
breakingfinancenews.com	4-traders.com
businessinsider.com	nytimes.com/pages/business
businessnewsdaily.com	nytimes.com/section/business/dealbook
cnbc.com/investing	online.barrons.com
investopedia.com	pennystock.com
wsj.com/news/business	reuters.com
zacks.com	reuters.com/finance
finance.yahoo.com	seekingalpha.com
financialpost.com	smallcapnetwork.com
finviz.com	stockcharts.com
fool.com	stockgumshoe.com
forbes.com	stockhouse.com
fortune.com	stockmarketadvantage.com
foxbusiness.com	stockwatch.com
ft.com	streetauthority.com
insidermonkey.com	thestreet.com
investing.com	valuewalk.com
investingchannel.com	wsj.com

“Microtargeted” Digital Media

The following campaign microtargeting optimization strategies will be utilized to achieve maximum engagement with the ads.

Strategy	Rationale
Contextual Targeting	Targeting websites with relevant content and context, such as those that provide investment and financial information, will help capture potential Class Members who were not in previous data-targeting pools but have an interest in finance-related topics.
Behavioral Targeting	Targeting user IDs across the Internet whose owners have shown activity in the past or placed themselves in data pools of our audience tab. For example: ads may be targeted to a user who works in the investment industry and is interested in SIBOR and/or SOR derivatives investing.
Predictive (Look-Alike) Modeling	With predictive modeling, look-alike modeling is deployed to target user IDs whose owners have strong similarities to users who have previously clicked through to the case website.
Customer Database Targeting	With customer databases that include physical addresses and/or email addresses, digital media can be served to those customers specifically, and also to audiences modeled on actual customers.

A.B. Data employs a fully staffed digital buying team to manage all digital and social media programs in-house for the greatest control and oversight. During the course of the digital notice schedule dates, A.B. Data’s digital media experts will monitor the success, conversions, and activity associated with the digital and social media campaigns and will optimize the number of impressions delivered across each platform to achieve maximum engagement and efficiency. A.B. Data’s digital media experts have the following certifications:

- Google Ads Display Certification
- Google Ads Search Certification
- Google Analytics Certification
- LinkedIn Ads Certification

With this level of expertise, digital and social media campaigns ensure that impressions are delivered to the target audience efficiently and effectively, with online ad verification and minimal threat of bot-traffic and inappropriate content. A.B. Data uses conversion tracking and website tags to monitor real-time performance of all ads, traffic, and website performance.

Earned Media

In addition to the notice efforts involving print publications and digital media, A.B. Data recommends that a news release be disseminated via *PR Newswire*'s US1 Newsline distribution list to announce the Notice of Settlements. This news release will be distributed via *PR Newswire* to the news desks of approximately 10,000 newsrooms, including print, broadcast, and digital websites across the United States.

News about the Settlements will also be broadcast to the news media via Twitter. It will be tweeted from *PR Newswire*'s and A.B. Data's Twitter accounts to thousands of news media reporters and other followers.

Notice Design Strategies

The Federal Rules of Civil Procedure require notices in class action cases to be written in "plain, easily understood language." This process has been utilized in developing the Long-Form Notice and Short-Form Notice for this case. A.B. Data is committed to adhering to the easily understood language requirement of Rule 23(c)(2) and Rule 23(b)(3).

The plain language Long-Form Notice developed for this Plan will be designed to be easily seen by potential Class Members with a large, bold headline. The plain, easily understood language in the text of the Long-Form Notice will allow potential Class Members the opportunity to read it at their leisure and ensure they understand the subject of the case, the steps they must take to join the Settlement Class, and the legal rights of all Class Members.

Each printed Short-Form Notice will prominently display a case website address, a toll-free telephone number, and a mailing address so that potential Class Members may review the detailed Long-Form Notice and other information available regarding the Settlements.

The online banner and newsfeed ads will be designed to alert potential Class Members and entities about the Settlements. The ads will each include a link to the case website so that potential Class Members may click on it and go directly to the website for Settlement information.

A sample banner ad is provided.



Due Process

The notice efforts described herein reflect a strategic, microtargeted, and contemporary method to deploy Class Notice to potential Class Members. The Notice Plan summarized in this document provides a reach and frequency similar to those that courts have approved and that are recommended by the Federal Judicial Center's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*.

The Notice Plan described in this document is consistent with notice plans that A.B. Data has developed and have been approved by the Court and implemented for other similar securities and financial instrument cases with regard to the methods and tools for developing such plans.

This Notice Plan is, in A.B. Data's experience, the best practicable under the circumstances for the Settlement Class and meets due process requirements.